

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff

Statement of Defendant with
Respect to Sentencing Factors

v.

20-CR-00184-JLS

MELANIE THOMPSON

Defendant

DANIEL J. HENRY, JR., ESQ., affirms under penalty of perjury that:

1. I am the attorney for the Defendant, Melanie Thompson, in the above captioned case, and am duly licensed to practice in Federal Court, Western District of New York.
2. I make this affirmation in accordance with the requirements of Section 6A1.2 of the Sentencing Guidelines, "Statement of Defendant with Respect to Sentencing Factors," as promulgated by the United States Sentencing Commission.
3. In accordance with those rules, it is hereby stated on behalf of the Defendant that I have reviewed the Revised Pre-sentence Report and have discussed the same with Ms. Thompson. Although we accept the calculations reached in the Pre-sentence Report, we contend that the statements/summaries of the events attributed to Victim 1 are embellished and/or inflated as it pertains to the Offense Conduct. We address such concerns in our Sentencing Memorandum.

DATED: July 8, 2021
Hamburg, New York

Respectfully Submitted,

/s/ Daniel J. Henry, Jr.
Daniel J. Henry, Jr., Esq.
Attorney for Melanie Thompson
16 Main Street
Hamburg, New York 14075
(716) 648-0510
dhenry@villarinianiandhenry.com

To: Hon. John L. Sinatra, Jr.
United States District Court
Western District of New York
2 Niagara Square
Buffalo, New York 14202-3350

Jeffrey T. Fiut, Esq.
United States Attorney's Office
Western District of New York
Federal Centre
138 Delaware Avenue
Buffalo, New York 14202

Matthew G. Zenger
United States Probation Department
United States Courthouse
2 Niagara Square
Buffalo, New York 14202-3350